

**THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

In re:)	Chapter 11
	1)
Product Quest Manufacturing, LLC, et al)	Case No. 18-50946
)	(Jointly Administered)
Debtors))
))

**MOTION OF THE BANKRUPTCY ADMINISTRATOR FOR ORDER ESTABLISHING A
DEADLINE FOR FILING CLAIMS FOR CHAPTER 11 ADMINISTRATIVE EXPENSES
AND CLAIMS PURSUANT TO 11 U.S.C. § 503(b)(9)**

Now comes the United States Bankruptcy Administrator (“BA”), by and through Counsel, and moves the Court pursuant to 11 U.S.C. §§503 and 503(b)(9) and Bankruptcy Rule 3003(c)(3) for an Order establishing a deadline to file claims for Chapter 11 administrative expenses and claims pursuant to 11 U.S.C. §503(b)(9) and in support thereof, shows the Court:

1. On September 7, 2018, the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Middle District of North Carolina (the “Court”). On September 13, 2018, this Court entered an Order determining that the Debtors’ cases should be jointly administered pursuant to Bankruptcy Rule 1015(b).

2. Effective October 31, 2018, this Court converted the cases to cases under Chapter 7 of the Bankruptcy Code. C. Edwin Allman, Esq. was appointed as interim Chapter 7 Trustee in all cases.

3. To ensure the orderly administration of these cases in Chapter 7 and to allow the trustee to make informed decisions as to the proper liquidation of assets, the parties require complete information as to the nature, validity and status of all the Chapter 11 administrative claims against the Debtors, including Section 503(b)(9) claims, and the BA submits that the establishment of a bar date at this time will promote the expeditious administration of the Debtors’ estates.

4. The BA requests that the Court set a deadline for each person or entity of any kind or status which holds or contends that it holds an administrative claim arising under Section 503 of the Bankruptcy Code from the operation of the Chapter 11 to file such Proof of Claim or Request for Payment of Administrative Expense as of the date which is 33 days following the date of the Order granting this Motion (“the Administrative Expense Bar Date”), except for claims arising under Section 503(b)(9) and claims of professionals, for which the court has previously set a bar date.

¹ The Debtors in these cases, along with the associated case number, are: (i) Ei LLC (18-50945);(ii) Product Quest Manufacturing, LLC (18-50946); (iii) Scherer Labs International, LLC(18-50948); (iv) Product Quest Logistics, LLC (18-50950); (v) JBTRS, L.L.C. (18-50951); and (vi)PQ Real Estate LLC (18-50952). The Debtors’ service address is: 2865 N. Cannon Blvd., Kannapolis, North Carolina 28083.

5. The BA requests that the Court set a deadline for each person or entity of any kind or status which holds or contends that it holds an administrative claim arising under Section 503(b)(9) of the Bankruptcy Code to file such Proof of Claim or Request for Payment of Administrative Expense as of the date which is 33 days following the date of the Order granting this Motion (“the 503(b)(9) Bar Date”).

6. All claimants asserting a claim against more than one Debtor should be required to file a separate Proof of Claim or Request for Payment and identify the particular Debtor against which such claim is asserted, including the case number.

7. All rights of a proper party to object to any claim on any appropriate grounds are reserved and unaffected by this Motion.

Dated: November 9, 2018

Respectfully submitted,

William P. Miller
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CERTIFICATE OF SERVICE via ELECTRONIC SERVICE

The undersigned certifies that on November 9, 2018 a copy of the Motion To Establish Deadlines was served upon the attached via electronic service:

Master Service List

C. Edwin Allman, III

John A. Northen

J. P. Cournoyer

Vicki Parrott

By: s/Susan Gattis
Bankruptcy Analyst

